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February 9, 2001

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **February 2001 Monthly Report**

Dear Mr. McAteer,

Enclosed is the February 2001 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc: K. Turner - USEPA
T. Gouger - USACE
C. Morin - IEPA
Sauget File - Solutia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)
Kevin de la Bruere - USF&W
Michael L. Henry - IDNR
Tom Long - Cahokia Consultant (% Sapphire Group)
Dave Webb - IDPH
Mayor J. Livigni - Cahokia, IL
Mayor P. Sauget - Sauget, IL

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: February 9, 2001
Period Covered: January 1, 2001 - January 31, 2000
Next Report Period: February 1, 2001 - February 28, 2001

Work Performed during the reporting period

All required field work for the Sauget Area 1 Support Sampling Plan ("SSP") was completed prior to this report period. During the month of January, the Sauget Area I Project Team focused on completion and submittal of the Data Report and draft Human Health and Ecological Risk Assessments. Work continued on preparation of the EE/CA and RI/FS Report.

There are no Technical Memos attached to this report.

Data Submittal

There is no data submitted in this report.

As required by the AOC, the draft EE/CA Report will be submitted to the Agencies by March 9, 2001. As we have discussed, the draft RI/FS Report will be consolidated with the EE/CA Report and submitted to the Agencies as an EECA / RIFS Report by March 9, 2001. Pursuant to the January 21, 1999 Administrative Order by Consent for Sauget Sites Area I; Scope of Work for Engineering Evaluation / Cost Analysis and Streamlined Remedial Investigation and Feasibility Study; Task 4: Engineering Evaluation / Cost Analysis Report (EE/CA); EE/CA Outline; 7. Schedule for EE/CA Submission, and pursuant to a discussion of alternatives at our January 24th meeting, Attachment I in this report is an array of "...alternatives to undergo a more detailed analysis..." in the draft EECA / RIFS Report.

Work scheduled for next reporting period

Work will continue on preparation of the consolidated EECA / RIFS Report to be submitted to the Agencies by March 9, 2001.

Problems and Solutions

NONE

Submittal Schedule Status

See attached schedule - consistent with the approved SSP - as revised where indicated.

Other Issues

May 31, 2000 UAO (Sediments Removal)

A related UAO was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was submitted to the Agencies June 30, 2000 for review and approval. Agreement on the major aspects of the TCRAWP was achieved in November. Additional agreements were reached in December - sufficient to proceed with issuance of a request for bids for the containment cell construction. Bids were received in late January and are now under evaluation.

Field work begun on the sediment de-watering phase of the project in November, 2000 and continued throughout the Report Period. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments over the next several months - while the containment cell is being constructed - continued throughout January. Progress was adversely affected by the severe winter conditions but was significant nonetheless. The de-watering field installations are nearing completion and will be started up in mid-February.

A contract for construction of the containment cell is targeted to be awarded by the later date of March 1, 2001 or upon U. S. EPA approval of the June 30, 2000 TCRAWP - as revised to address Agencies concerns.

Comments:

NONE

January 21, 1999 Sauget Area I AOC
SCHEDULE

(11/99 Revision)

- | | |
|--|---|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ²
June 25, 1999 ³
August 13, 1999 ⁴
October 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶
October 17, 1999 ⁷
October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved October 9, 1999 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved October 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)
(11/99)

9. Sampling Notification	10 Business Days Prior to Start of Work ⁹
10. Submit Data Report	01/09/01 ¹⁰
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 ¹¹

⁹ Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹¹ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.

ATTACHMENT I

PROPOSED REMEDIAL ALTERNATIVES FOR DETAILED ANALYSIS SAUGET AREA 1

Alternative	Ground Water
Alternative A	Institutional Controls (potable use ordinance, fencing, community relations) Ground-Water monitoring
Alternative B	Institutional Controls (potable use ordinance, fencing, community relations) Ground-Water monitoring Hydraulic Containment & Treatment (down gradient of Fill Area I)
Alternative C	Institutional Controls (potable use ordinance, fencing, community relations) Ground-water monitoring Plume Removal & Treatment (Fill Area I and down-gradient area)

Alternative	Fill Areas
Alternative A	Institutional Controls (fencing, community relations) Ground-Water monitoring
Alternative B	Institutional Controls (fencing, community relations) Ground-Water Monitoring DNAPL removal (beneath Fill Area G and I)
Alternative C	Institutional Controls (fencing, community relations) Ground-Water Monitoring Containment (low permeability cap for Fill Area I, protective cap for Fill Areas G, H, & L) DNAPL removal (beneath Fill Area G and I)
Alternative D	Institutional Controls (fencing, community relations) Ground-Water Monitoring Containment (low permeability cap for Fill Areas G, H, I & L) DNAPL removal (beneath Fill Area G and I)